DAYLE ELIESON United States Attorney PATRICK WILLIAM SNYDER, CSBN 260690 Special Assistant United States Attorney THEOPHOUS H. REAGANS, CSBN 189450 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (415) 977-8938 Facsimile: (415) 744-0134 E-Mail: Theophous.Reagans@ssa.gov Attorneys for Defendant SUSANNE DOBRANYI,

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SUSANNE DOBRANYI,

Plaintiff,

V.

DEFENDANT'S EX PARTE MOTION
FOR EXTENSION OF TIME

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Defendant, through her undersigned attorney, moves for a first 30-day extension of time up to and including October 4, 2018, in which to respond to Plaintiff's Complaint, previously due September 4, 2018. Defense Counsel seeks an extension by motion rather than by stipulation because he was unable to reach Plaintiff on the telephone number provided in the docket sheet.

An extension of time is needed because the attorney responsible for drafting and filing the answer in this case is undergoing medical treatment, requiring her to take medical leave. This motion is being filed by her supervisor because she is currently unable to work on her cases. This is the first extension of time requested by Defendant in the above referenced case. This request is made in good faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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3	Dated: August 28, 2018	DAYLE ELIESON
4		United States Attorney
5		<u>/s/ Patrick William Snyder</u> PATRICK WILLIAM SNYDER
6		Special Assistant United States Attorney
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8		<u>/s/ Theophous H. Reagans</u> THEOPHOUS H. REAGANS
9		Special Assistant United States Attorney
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11		IT IS SO OPPENED
12		IT IS SO ORDERED:
13		Cam Ferenbach
14		UNITED STATES MAGISTRATE JUDGE
15		August 30, 2018 DATE:
16		DATE.
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PROOF OF SERVICE BY MAILING

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25 26 THEOPHOUS H. REAGANS I declare under penalty of perjury that the foregoing is true and correct.

I am over the age of 18 and not a party to the within action. I am employed by the Social Security Administration's Office of the Regional Chief Counsel, Region IX. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105.

On August 29, 2018, I served the foregoing: **EX PARTE MOTION FOR EXTENSION OF** TIME FOR DEFENDANT TO FILE THE RESPONSE TO PLAINTIFF'S COMPLAINT on persons or entities named below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices. I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business within the United States Postal Service in a sealed envelope with postage fully prepaid.

Date of mailing: August 29, 2018

Place of mailing: San Francisco, California.

Person(s) and/or Entity(s) To Whom Mailed:

Susan Dobranyi

/s/ Theophous H. Reagans

1469 Dragon Rock Drive

Henderson, NV 89-52

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct. I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on: August 29, 2018 at San Francisco, California.